

Exhibit 59

From: [Christopher Geddis](#)
To: [Priselac, Jessica](#)
Cc: [Good, Rachel](#); [Adam Slater](#)
Subject: FW: Valsartan: ZHP Parties Document Production ZHP052
Date: Wednesday, February 9, 2022 5:11:00 PM
Attachments: [2-9-2022 Cover Letter Regarding Document Production ZHP052.PDF](#)
[ZHP Parties Production Index, 2-9-2022.XLSX](#)

Hi Jessica,

Are any of these documents related to the Rule 37 sanctions motion?

Best,
Chris

From: Good, Rachel <RMGood@duanemorris.com>
Sent: Wednesday, February 9, 2022 11:44 AM
To: 'rhonik@golombhonik.com' <rhonik@golombhonik.com>; 'd.stanoch@kanner-law.com' <d.stanoch@kanner-law.com>; Adam Slater <ASlater@mazieslater.com>; 'dnigh@levinlaw.com' <dnigh@levinlaw.com>; 'c.whiteley@kanner-law.com' <c.whiteley@kanner-law.com>
Cc: Behram Parekh <behran.parekh@drllawllp.com>; 'argenal@csdisco.com' <argenal@csdisco.com>; 'valpec@kirtlandpackard.com' <valpec@kirtlandpackard.com>; 'CohenL@gtlaw.com' <CohenL@gtlaw.com>; 'cct@pietragallo.com' <cct@pietragallo.com>; 'jpoletto@hkmpp.com' <jpoletto@hkmpp.com>; 'alexia.brancato@kirkland.com' <alexia.brancato@kirkland.com>; Klein, Alan <AKlein@duanemorris.com>; Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Priselac, Jessica <JPriselac@duanemorris.com>; Bazan, Rebecca <REBazan@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; 'valsartan@csdisco.com' <valsartan@csdisco.com>; Cheryll Calderon <ccalderon@mazieslater.com>; Ashleigh Raso <araso@meshbesh.com>; Bonner, Kelly <KABonner@duanemorris.com>; 'Lars Myrabo' <myrabo@csdisco.com>
Subject: Valsartan: ZHP Parties Document Production ZHP052

Counsel,

Please see the attached letter and production index.

Please let me know if you have any difficulty accessing the documents and overlay from the Aquipt document repository.

Best,

Rachel

From: Good, Rachel

Sent: Wednesday, February 2, 2022 5:59 PM

To: 'rhonik@golombhonik.com' <rhonik@golombhonik.com>; 'd.stanoch@kanner-law.com' <d.stanoch@kanner-law.com>; 'aslater@mazieslater.com' <aslater@mazieslater.com>; 'dnigh@levinlaw.com' <dnigh@levinlaw.com>; 'c.whiteley@kanner-law.com' <c.whiteley@kanner-law.com>

Cc: 'Behram Parekh' <behran.parekh@drllawllp.com>; 'argenal@csdisco.com' <argenal@csdisco.com>; 'valpec@kirtlandpackard.com' <valpec@kirtlandpackard.com>; 'CohenL@gtlaw.com' <CohenL@gtlaw.com>; 'cct@pietragallo.com' <cct@pietragallo.com>; 'jpoletto@hkmpp.com' <jpoletto@hkmpp.com>; 'alexia.brancato@kirkland.com' <alexia.brancato@kirkland.com>; Klein, Alan <AKlein@duanemorris.com>; Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Priselac, Jessica <JPriselac@duanemorris.com>; Bazan, Rebecca <REBazan@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; 'valsartan@csdisco.com' <valsartan@csdisco.com>; 'Cheryll Calderon' <ccalderon@mazieslater.com>; 'araso@meshbeshher.com' <araso@meshbeshher.com>; Bonner, Kelly <KABonner@duanemorris.com>; 'Lars Myrabo' <myrabo@csdisco.com>

Subject: Valsartan: ZHP Parties Document Production ZHP051

Counsel,

Please see the attached letter and production index.

Please let me know if you have any difficulty accessing the documents and overlay from the Aquipt document repository.

Best,

Rachel

From: Good, Rachel

Sent: Friday, January 21, 2022 10:47 PM

To: rhonik@golombhonik.com; d.stanoch@kanner-law.com; aslater@mazieslater.com; dnigh@levinlaw.com; c.whiteley@kanner-law.com

Cc: Behram Parekh <behran.parekh@drllawllp.com>; argenal@csdisco.com; valpec@kirtlandpackard.com; CohenL@gtlaw.com; cct@pietragallo.com; jpoletto@hkmpp.com; alexia.brancato@kirkland.com; Klein, Alan <AKlein@duanemorris.com>; Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Priselac, Jessica <JPriselac@duanemorris.com>; Bazan, Rebecca <REBazan@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; valsartan@csdisco.com; Cheryll Calderon <ccalderon@mazieslater.com>; araso@meshbeshher.com; Bonner, Kelly <KABonner@duanemorris.com>; Lars Myrabo <myrabo@csdisco.com>; Good, Rachel